

August 31, 2016

VIA U.S. MAIL

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

Re: ***Freedom of Information Act Request:
Omega Chemical Corporation Superfund Site***
Our Client: Continental Heat Treating, Inc.

Dear Sir/Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, *et seq.*, we write to request the public records described below, which are related to the Omega Chemical Corporation Superfund Site, listed on the National Priorities List on January 19, 1999, 64 Fed. Reg. 2950 ("Omega Site").

We hereby offer to pay the fees covering the direct costs of duplication. This request falls within category (g)(4), "all other requests" under 49 C.F.R. § 7.42(g) as it is being sought in connection with ongoing litigation. We also request that exact copies of the requested writings be provided, unless it is impracticable to do so.

The records requested writings are as follows:

1. Any and all writings reflecting correspondence between and among representatives of EPA and ExxonMobil Oil Corporation ("ExxonMobil") concerning EPA's settlement with ExxonMobil and others in an Administrative Order on Consent ("AOC") regarding the Omega Site, which was finalized on or about December 12, 2005.
2. The "General Notice Letter," sent by EPA to ExxonMobil in or around December of 2013, regarding ExxonMobil's potential liability for the groundwater contamination operable unit ("OU-2") of the Omega Site.

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3. Any and all writings reflecting correspondence between and among EPA and ExxonMobil regarding the "General Notice Letter and Request for Information" sent by EPA to ExxonMobil in or around December, 2013 concerning ExxonMobil's potential liability to EPA under CERCLA for cleanup of the Omega Site.
4. Any and all writings reflecting correspondence between and among EPA and ExxonMobil regarding the "Special Notice Letter" sent by EPA to ExxonMobil in or around December, 2013 concerning ExxonMobil's potential liability to EPA under CERCLA for cleanup of the Omega Site.
5. Any and all writings reflecting correspondence between and among EPA and ExxonMobil regarding EPA's potential claims against ExxonMobil pursuant to CERCLA for response costs related to the Omega Site.
6. Any and all writings reflecting correspondence between and among EPA and ExxonMobil regarding or in connection with Continental Heat Treating, Inc. and/or its facility located at 10643 South Norwalk Boulevard, Santa Fe Springs, California.
7. Any and all writings reflecting correspondence between and among EPA and the Omega Chemical Site Potentially Responsible Parties Organized Group ("OPOG"), or any member thereof, regarding investigation and/or a proposed remedial action addressing the groundwater contamination operable unit (OU-2) of the Omega Site.
8. Any and all writings reflecting investigations (e.g., characterization studies, remedial investigation reports, feasibility studies, conceptual cost estimates, and related technical documents) or proposed remedial actions regarding the groundwater contamination operable unit (OU-2) of the Omega Site.

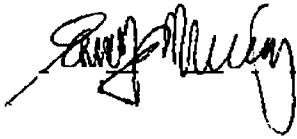
We thank you in advance for your prompt cooperation and assistance with respect to this request. If you have any questions or comments, or require additional information or clarification with respect to this request, please do not hesitate to contact our office.

WOOD SMITH
HENNING & BERMAN LLP

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Very truly yours,

WOOD, SMITH, HENNING & BERMAN LLP

A handwritten signature in black ink, appearing to read "Emil A. Macasinag", written over a horizontal line.

By: _____
EMIL A. MACASINAG

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